



MONTANA
TELECOMMUNICATIONS
ASSOCIATION

September 7, 2011

Marlene Dortch, Secretary
Federal Communications Commission
334 12th Street, SW
Washington, D.C.

In the Matter of

Establishing Just and Reasonable Rates
for Local Exchange Carriers,
Call Blocking by Carriers

WC Docket 07-135

Developing an Unified Inter-carrier
Compensation Regime

CC Docket No. 01-92

Rules and Regulations Implementing
the Truth in Caller ID Act of 2009

WC Docket No. 11-39

Dear Ms. Dortch,

On May 6, 2011, Betty Buckley, Executive VP of the Washington Independent Telecommunications Association, and met with Terry Cavanaugh and Margaret Dailey of the Enforcement Bureau and Lynn Engledow of the Wireline Competition Bureau to urge immediate action by the FCC against telecommunications providers whose actions are preventing telecommunications traffic from properly terminating on local networks. The actions by these providers are causing serious harm to commercial activity and personal security.

It is not clear what action, if any, the FCC is taking to thwart this clear and present threat to our nation's telecommunications network and the consumers who depend on efficient, reliable telecommunications. I have heard that there is a group is looking into this, but reports in the field indicate that the problem is not getting any better—in fact, it's getting worse.

Meanwhile, I have read that the FCC has scheduled a network reliability and continuity workshop later this week, and the FCC also appears to be most concerned about the temporary loss of some (wireless) telecommunications traffic as a result of the recent earthquake in the DC area and Tropical Storm Irene.

Marlene Dortch
September 7, 2011
Page 2

It seems to me that a virus that has been affecting telecommunications traffic nationwide for more than a year, which the FCC has been made aware of repeatedly, warrants at least as much attention as the also-important issue of intermittent loss of signal during natural disasters.

Attached to this letter, below, are two recent emails sent to Range Telephone Cooperative, headquartered in Forsyth, Montana, as examples of the continuing crisis in our nation's network operations. Also attached are:

- the *ex parte* notice filed by Betty Buckley and me on May 6, 2011; and
- the August 24, 2011 Comments of the "Western Associations" on the FCC's Further Notice on Universal Service/Intercarrier Compensation reform. The Western Associations point out the continuing call termination/failure problem and cite a number of other references, including *ex parte* communications and dockets that have been opened in both Washington and Oregon.

I respectfully reiterate the plea that Ms. Buckley and I made in May urging the FCC to use its full resources to put an immediate end to this threat to our nation's telecommunications capabilities. There is no reason that this critical issue should receive any less public attention or focus by the Commission than the Chairman's concern about other crises that undermine the reliability and continuity of our communications networks.

Respectfully submitted,

/s/

Geoffrey A. Feiss, General Manager
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cc: Terry Cavanaugh, Enforcement Bureau
Margaret Dailey, Enforcement Bureau
Lynne Engledow, Wireline Competition Bureau
James Barnett, Chief, Public Safety & Homeland Bureau

----- Forwarded Message

From: Rob Stephens <rob@rangetel.coop>

Date: Tue, 06 Sep 2011 08:34:00 -0600

To: 'Geoff Feiss' <gfeiss@telecomassn.org>

Subject: FW: telephone problems

-----Original Message-----

From: Nancy Carrel [<mailto:jncarrel@rangeweb.net>]

Sent: Tuesday, September 06, 2011 8:03 AM

To: Rob Stephens

Subject: telephone problems

Dear Rob: I appreciate that someone is trying to do something about our telephone service.

I wrote to you about our long distance problems some time last winter, I think, and you responded. I might say that things seemed a little better in the spring.

Now I can say that they are MUCH WORSE. If it would help to have documentation, I can cite two instances in the past week. A businessman in Philadelphia, PA had an appointment to call me last Friday, Sept. 2, at 8 AM. It was an important matter. I knew he was going to call at that time. I waited for 20 minutes, and finally he got through to me. He had been trying, unsuccessfully, all that time. It was a significant inconvenience to both of us. He only succeeded because he was so persistent.

My son called from Sheridan, WY late last night (Sept. 5). He wanted to know if I had gotten home all right, driving by myself. We had made an arrangement to do this. When he called, after trying 3 or 4 times to get through, my telephone finally rang but there was no voice on the other end. Then I called him back, and I did get through to him. This is something that matters to us a lot, especially in the winter time.

I am just telling you two of many incidents. One cannot tell what other ones there are, if the caller is not persistent enough.

Thanks for your efforts in this matter.

Nancy Carrel

----- End of Forwarded Message

----- Forwarded Message

From: Rob Stephens <rob@rangetel.coop>

Date: Tue, 06 Sep 2011 08:35:00 -0600

To: 'Geoff Feiss' <gfeiss@telecomassn.org>

Subject: FW: Telephone service

From: Chris Valentine [<mailto:svalentine@rangeweb.net>]

Sent: Sunday, September 04, 2011 1:22 PM

To: Rob Stephens

Subject: Telephone service

Hi Rob -

This is just to document for you that the long distance service has deteriorated once more.

1. A recent call from the UK had to be placed 3 times before we could get enough quality of signal to talk with each other. Signal was breaking up.

2. Calls from WY either do not reach me or are of such poor quality I have to re-dial from my end 1-3 times before we have audibility enough to talk. Issues are volume., crackling and breaking up.

I appreciated the piece in the range Newsletter about the meeting with the FCC.

Thanks for all you are doing - Chris

----- End of Forwarded Message